

EXHIBIT A

Received & Filed - Superior Court
LEWIS COUNTY, WASH

OCT 20 2017

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6 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON IN
7 AND FOR THE COUNTY OF LEWIS

8
9 ROBERT COOPER and CRYSTAL
COOPER

10 Plaintiffs,

11 Cause No.: 17-2-0006921

12 v.
13 PROVIDENCE HEALTH CARE
14 FOUNDATION d/b/a PROVIDENCE
15 CENTRALIA HOSPITAL; NORTHWEST
16 EMERGENCY PHYSICIANS, LLC.; and
17 LEWIS COUNTY COMMUNITY HEALTH
18 SERVICES d/b/a VALLEY VIEW HEALTH
19 CENTER

Defendants.

20 Plaintiff alleges:

21 1. **PLAINTIFF** - Plaintiff Robert Cooper is a resident of Washington.
22 2. **PLAINTIFF** - Plaintiff Crystal Cooper is a resident of Washington.
23 3. **DEFENDANTS BUSINESS ENTITIES** - Defendant PROVIDENCE HEALTH

24 CARE FOUNDATION is a business that was at the time of the occurrence involved in the
25 ownership, management and/or operation of Providence Centralia Hospital, a hospital located at
26 914 South Scheuber Road, Centralia, Washington 98531. Defendant has been served.

1 Defendant NORTHWEST EMERGENCY PHYSICIANS, LLC, is a business that was at
2 the time of the occurrence involved in the ownership, management and/or operation of MD
3 services at PROVIDENCE CENTRALIA HOSPITAL. Defendant has been served.

4 Defendant LEWIS COUNTY COMMUNITY HEALTH SERVICES is a business that
5 was at the time of the occurrence involved in the ownership, management and/or operation of
6 Valley View Health Center Cascade, a healthcare clinic located at 2428 Reynolds Rd., Centralia,
7 Washington 98531. Defendant may be served through its registered agent: Lewis County
8 Community Health Services, 2690 N.E. Kresky Avenue, Chehalis, Washington, 98532.
9

10 Venue is proper in Lewis County, Washington, pursuant to RCW 4.12.025.

11 4. **OCCURRENCE** - Plaintiff, Robert Cooper, sought treatment for severe back pain
12 radiating down into his legs on December 17, 2015, at Providence Centralia Hospital. Defendant
13 was made aware that Mr. Cooper had been to the emergency room for back and leg pain one
14 week prior to this visit and that the pain had become worse over time and progressed from his
15 back to his legs. Defendant Providence Centralia Hospital breached the standard of care on the
16 occasion of this visit to that institution by failing to properly diagnose Mr. Cooper's condition
17 and failing to do a radiographic scan; and did not recommend or facilitate follow up with a
18 specialist, which would have easily detected the severe spinal stenosis that was causing severe
19 radiating pain at that time.
20

21 Based on information and belief, the physician assistant responsible for Mr. Cooper's
22 negligent care was employed jointly by PROVIDENCE HEALTH CARE FOUNDATION d/b/a
23 PROVIDENCE CENTRALIA HOSPITAL; and NORTHWEST EMERGENCY PHYSICIANS,
24 LLC. Defendant NORTHWEST EMERGENCY PHYSICIANS, LLC, is responsible for the
25 negligent care described in the preceding paragraph.
26

1 Plaintiff, Robert Cooper, followed up with his primary care provider on December 21,
2 2015, at Valley View Health Center Cascade, and was seen by Tracy Svoboda, ARNP, who
3 diagnosed bilateral sciatica. Despite the presentation of progressing back and leg pain, Valley
4 View did not order a radiographic scan, and did not recommend or facilitate follow up with a
5 specialist, which would have easily diagnosed Mr. Cooper's severe spinal stenosis from which
6 he was suffering from at the time. This failure is a breach of the standard of care.
7

8 The failure to diagnose Mr. Cooper's condition on the part of defendants directly led to a
9 delay in treatment and a severe worsening of Mr. Cooper's condition, and led to the development
10 of cauda equina and paralysis on December 26, 2015.

11 **5. NEGLIGENCE** - The negligence of PROVIDENCE HEALTH CARE
12 FOUNDATION d/b/a Providence Centralia Hospital, NORTHWEST PHYSICIANS, INC., and
13 LEWIS COUNTY COMMUNITY HEALTH SERVICES d/b/a VALLEY VIEW HEALTH
14 CENTER were a proximate cause of Robert Cooper's incomplete paraplegia, disability and other
15 injuries resulting from negligence.

16 **6. DAMAGES** - Damages should be awarded to Plaintiff Robert Cooper for past and
17 future pain and suffering, physical impairment, disability, loss of enjoyment of life, and past and
18 future medical and custodial care, and past and future lost earnings and lost earning capacity, that
19 was necessitated by the acts and omissions of Defendants.
20

21 **7. DAMAGES** - Damages should be awarded to Plaintiff Crystal Cooper for loss of
22 consortium.
23

24 WHEREFORE, Plaintiff prays for judgment against Defendants, for damages in the
25 amount determined by the trier of fact, together with costs and interest as allowed by law,
26 together with such further relief as the court deems just and equitable.
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2 DATED this 18th day of October, 2017.
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4 Respectfully Submitted,
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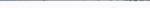
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

The undersigned hereby certifies under penalty of perjury under the laws of the State of Washington that on the 18th day of October, 2017, at Bellevue, Washington, the foregoing was caused to be served on the following person(s) in the manner indicated:

<p>Scott M. O'Halloran Amanda K. Thorsvig Fain Anderson Vanderhoef Rosendahl O'Halloran Spillane, PLLC 1301 A Street, Suite 900 Tacoma, WA 98402 Attorneys for Defendant Providence</p>	<p>VIA REGULAR MAIL _____ VIA CERTIFIED MAIL _____ VIA HAND DELIVERY _____ BY FACSIMILE _____ VIA OVERNIGHT MAIL _____ VIA ELECTRONIC MAIL <input checked="" type="checkbox"/></p>
<p>David J. Corey Floyd, Pflueger & Ringer, P.S. 200 West Thomas Street, Suite 500 Seattle, WA 98119-4296 Attorneys for Defendant NW Emergency Physicians, LLC</p>	<p>VIA REGULAR MAIL _____ VIA CERTIFIED MAIL _____ VIA HAND DELIVERY _____ BY FACSIMILE _____ VIA OVERNIGHT MAIL _____ VIA ELECTRONIC MAIL <input checked="" type="checkbox"/></p>


Stephen Hornbuckle